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February 11, 2021

Via ECF

The Honorable Denise L. Cote
United States District Court
Southern District of New York
500 Pearl Street, Room 1610
New York, New York 10007

Re: Encarnacion et al. v. City of New York, 16 Civ. 156 (DLC)

Dear Judge Cote:

We represent Plaintiffs in the above-referenced case. Yesterday¹ we filed a reply brief (ECF No. 107) in support of Plaintiffs' motion to enforce the Court-ordered Settlement Agreement (ECF No. 94).

Pursuant to Rule 4(F) of the Court's Individual Practices in Civil Cases, Plaintiffs respectfully request oral argument with respect to this motion, as it may provide an opportunity for the parties to clarify facts and arguments relating to the nearly three-year history of the Settlement leading up to this motion.

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Niji Jain

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¹ Plaintiffs had prepared to file this letter motion shortly after filing their reply memorandum of law on February 10, but shortly afterward, the ECF website for the Southern District of New York appears to have had a service interruption, and the site was down for the remainder of the day. As a result, Plaintiffs are filing this request immediately upon resumption of the ECF website's normal operations, which is the morning following the filing of their reply papers.

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cc: All Counsel (via ECF)